

**THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**DEBORAH MEREDITH,**

**Plaintiff,**

**v.**

**UNITED COLLECTION BUREAU, INC.,**

**Defendant.**

**1:16-cv-01102-PAG**

**Hon. Judge Patricia A. Gaughan**

**DEFENDANT'S RESPONSE TO  
PLAINTIFF'S CONFIRMATORY INTERROGATORY NO. 2**

Defendant United Collection Bureau, Inc. ("UCB"), by and through counsel, submits the following objections and responses to Plaintiff's Confirmatory Interrogatory No. 2:

**INTERROGATORY**

**Interrogatory 2:** Provide the total number of cell phone numbers you called, where any prerecorded message was played during any call, where there is an indication in your records that such cell phone number was a "wrong number," i.e. that of a non-debtor; plus the number of calls to each of those numbers.

**Answer:** UCB played a total of 634 pre-recorded messages during the relevant class period (May 9, 2012, through October 5, 2018). These messages were left on 194 unique cell phone numbers.

Dated: July 2, 2019

**UNITED COLLECTION BUREAU, INC.**

/s/ Meagan A. Mihalko

Keith J. Barnett (*admitted pro hac vice*)  
Lindsey B. Mann (*admitted pro hac vice*)  
TROUTMAN SANDERS LLP  
600 Peachtree Street NE, Suite 3000  
Atlanta, GA 30308  
(404) 885-3000  
keith.barnett@troutmansanders.com  
lindsey.mann@troutmansanders.com

Ethan G. Ostroff (*admitted pro hac vice*)  
TROUTMAN SANDERS LLP  
222 Central Park Ave., Suite 2000  
Virginia Beach, Virginia 23462  
(757) 687-7500  
ethan.ostroff@troutmansanders.com

Meagan A. Mihalko (*admitted pro hac vice*)  
TROUTMAN SANDERS LLP  
1001 Haxall Point, Suite 1500  
Richmond, VA 23219  
(804) 697-1281  
meagan.mihalko@troutman.com

Jason P. Ferrante  
MARSHALL DENNEHEY WARNER  
COLEMAN & GOGGIN, P.C.  
127 Public Square, Suite 3510  
Cleveland, OH 44114  
jpferrante@mdwgcg.com

*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that, on July 2, 2019, I sent a true and correct copy of the foregoing document via electronic mail to the following counsel of record:

Alexander H. Burke  
BURKE LAW OFFICES, LLC  
155 N. Michigan Ave., Suite 9020  
Chicago, IL 60601  
Telephone: (312) 729-5288  
aburke@burkelawllc.com

Larry P. Smith (*pro hac vice*)  
David Marco (*pro hac vice*)  
SMITHMARCO, P.C.  
55 W. Monroe St., Suite 1200  
Chicago, IL 60603  
Telephone: (888) 822-1777  
lsmith@smithmarco.com  
dmarco@smithmarco.com

Mitchel E. Luxenburg  
THE LAW FIRM OF MITCH LUXENBURG  
23875 Commerce Park, Ste. 105  
P.O. Box 22282  
Beachwood, OH 44122  
Telephone: (216) 452-9301  
mitch@mluxlaw.com

*Counsel for Plaintiff*

/s/ Meagan A. Mihalko  
*Attorney for Defendant*  
*United Collection Bureau, Inc.*

**THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**


DEBORAH MEREDITH,	)	
	)	1:16-cv-01102-PAG
Plaintiff,	)	
	)	Judge Gaughan
v.	)	
	)	
UNITED COLLECTION BUREAU, INC.,	)	
	)	
Defendant.	)	

**VERIFICATION**

I, Mark Beirdneau, state that I have read Defendant United Collection Bureau, Inc.'s Answer to Plaintiff's Second Confirmatory Interrogatory, and that the answer contained therein is true and accurate to the best of my knowledge, information, and belief.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 2, 2019.

  
\_\_\_\_\_  
Mark Beirdneau